IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

LIONRA TECHNOLOGIES LIMITED v. FORTINET, INC.	Case No. 2:22-cv-00322-JRG-RSP (Lead Case) **JURY TRIAL DEMANDED** **FILED UNDER SEAL**
LIONRA TECHNOLOGIES LIMITED v. CISCO SYSTEMS, INC.	Case No. 2:22-cv-00305-JRG-RSP (Member Case)
LIONRA TECHNOLOGIES LIMITED v. PALO ALTO NETWORKS, INC.	Case No. 2:22-cv-00334-JRG-RSP (Member Case)

DEFENDANT CISCO SYSTEMS, INC.'S NOTICE PURSUANT TO 35 U.S.C. § 282

Pursuant to 35 U.S.C. § 282(c), Defendant Cisco Systems, Inc. ("Cisco") provides notice (the "Section 282 Notice") to Plaintiff Lionra Technologies Limited ("Lionra") of patents, publications, other prior art, and witnesses upon which Cisco may rely to establish the invalidity and the state of the art as to U.S. Patent No. 7,685,436 ("the '436 patent"), U.S. Patent No. 8,566,612 ("the '612 patent"), and U.S. Patent No. 7,921,323 ("the '323 patent").

Cisco has already provided the requisite notice through the pleadings and documents filed or served over the course of this litigation, including but not limited to its answer to the complaint, initial disclosures, invalidity contentions, expert reports, discovery responses, fact and expert depositions, trial exhibit lists, trial witness lists, and all documents cited or relied upon therein (collectively, the "Prior Notice"). These pleadings and documents comprising the Prior Notice

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include the information that Section 282 requires with respect to the patents, publications, other prior art, and witnesses upon which Cisco intends to rely to establish the invalidity and the state of the art as to the asserted claims of the '436, '612, and '323 patents. Cisco therefore incorporates by reference that Prior Notice into this Section 282 Notice as if fully set forth herein. For the same reason, Cisco incorporates by reference into this Section 282 Notice all prior art cited or otherwise contained in the prosecution records of the applications that issued as the '436, '612, and '323 patents, as well as any related applications that were filed in the United States or world. Cisco additionally reserves the right to rely on any testimony or admissions of the named inventors of the '436, '612, and '323 patents or any experts engaged (past or present) by Lionra regarding the state of the art as to the asserted claims of the '436, '612, and '323 patents.

In addition, Cisco identifies the following prior art and trial witnesses who may testify in connection with Cisco's contentions as to invalidity of the '436, '612, and '323 patents.

I.   PRIOR ART

A.   System Art

System, Publication, or Other Document	Bates Beg	Bates End
Cisco Catalyst Series 6500		
Cisco Supervisor Engine		
Cisco IDSM-2		
Best Practices for Catalyst 6500/6000 Series and Catalyst 4500/4000 Series Switches Running Cisco IOS Software	CISCO_LIONRA_00132464; CISCO_LIONRA_00330103	CISCO_LIONRA_00132607; CISCO_LIONRA_00330217
Full BOM Reports	CISCO_LIONRA_00144080	CISCO_LIONRA_00144080
Catalyst 6500 Series Switch and Cisco 7600 Series Router Firewall Services Module	CISCO_LIONRA_00125041	CISCO_LIONRA_00125187

System, Publication, or Other Document	Bates Beg	Bates End
Configuration Guide, 4.1; Applying Application Later Protocol Inspection, 2019-08-08		
Catalyst 6500 Series Switch and Cisco 7600 Series Router Firewall Services Module Configuration Guide, 4.1; Introduction to the Firewall Services Module, 2019-08-06	CISCO_LIONRA_00117549	CISCO_LIONRA_00117577
Catalyst 6500 Series Switch Installation Guide, Product Overview	CISCO_LIONRA_00030055	CISCO_LIONRA_00030148
Catalyst 6500 Series Switch Software Configuration Guide, Software Release 8.7	CISCO_LIONRA_00330502	CISCO_LIONRA_00331989
Catalyst 6500 Series Switch Supervisor Engine Guide	CISCO_LIONRA_00132660	CISCO_LIONRA_00132739
Catalyst 6500 SSL Module Execution Commit (EC) 2.1 Version, September 4th, 2003	CISCO_LIONRA_00116240	CISCO_LIONRA_00116280
Cisco 6500 Service Modules - Cisco Community	CISCO_LIONRA_00330382	CISCO_LIONRA_00330394
Cisco 6500/6000 Switch High CPU Utilization	CISCO_LIONRA_00332197	CISCO_LIONRA_00332222
Cisco Catalyst 6500 Series	DEFS_LIONRA_00005001	DEFS_LIONRA_00005007
Cisco Catalyst 6500 Series Content Switching Module with SSL	CISCO_LIONRA_00114381; CISCO_LIONRA_00330320	CISCO_LIONRA_00114383; CISCO_LIONRA_00330327
Cisco Catalyst 6500 Series Intrusion Detection System (IDSM-2) Service Module Data Sheet	CISCO_LIONRA_00114384	CISCO_LIONRA_00114387

System, Publication, or Other Document	Bates Beg	Bates End
Cisco Catalyst 6500 Series Switch - Access Control List Processing Hardware vs Software	CISCO_LIONRA_00332046	CISCO_LIONRA_00332048
Cisco Catalyst 6500 Series Switch Data Sheet	CISCO_LIONRA_00330395	CISCO_LIONRA_00330425
Cisco Catalyst 6500 Switch Architecture, Session RST-5401	CISCO_LIONRA_00332085	CISCO_LIONRA_00332144
Cisco Content Hub; Catalyst 6500 Series Switch and Cisco 7600 Series Router Firewall Services Module Configuration Guide, 4.1	CISCO_LIONRA_00330218	CISCO_LIONRA_00330252
Cisco Firewall Services Module for Cisco Catalyst 6500 Series and Cisco 7600 Series	CISCO_LIONRA_00114365; CISCO_LIONRA_00110399	CISCO_LIONRA_00114372; CISCO_LIONRA_00110410
Cisco IPSec VPN Services Module Webpage	CISCO_LIONRA_00045364	CISCO_LIONRA_00045365
Cisco Product Info (WS-C6506)	CISCO_LIONRA_00144081	CISCO_LIONRA_00144087
Cisco Secure Socket Layer (SSL) Services Module Webpage	CISCO_LIONRA_00045348	CISCO_LIONRA_00045350
Data sheet; Catalyst 6000 Intrusion Detection System Module	DEFS_LIONRA_00004932	DEFS_LIONRA_00004938
Data Sheet; Catalyst 6000 Intrusion Detection System Module	DEFS_LIONRA_00004921	DEFS_LIONRA_00004924
Falcon Inline Software Functional Specification	CISCO_LIONRA_00143638	CISCO_LIONRA_00143644
Fornax Catalyst 6000 Firewall Blade Concept Commit June 1st, 2001	CISCO_LIONRA_00114726	CISCO_LIONRA_00114778
FORNAX Design: High Performance firewall for C6K, introduction IBM NP based, 2001-04-30	CISCO_LIONRA_00122464	CISCO_LIONRA_00122491
IDSM-2 Service Module for the Catalyst 6500	CISCO_LIONRA_00139514; CISCO_LIONRA_00332249	CISCO_LIONRA_00139527; CISCO_LIONRA_00332261

System, Publication, or Other Document	Bates Beg	Bates End
Chassis Features, Management, Pricing & Comparisons to IDSM-1 Ver 17		
IPSM-3 Service Module for 6500 Switch and 7600 Router Chassis; Project "Roadster"; Product Requirements Document	CISCO_LIONRA_00132754	CISCO_LIONRA_00132780
Memory Guidance for Cisco Catalyst 6500 Series Switches, Q&A	CISCO_LIONRA_00332049	CISCO_LIONRA_00332055
SSL Services Module for the Catalyst 6500 & Cisco 7600 Series	CISCO_LIONRA_00114373	CISCO_LIONRA_00114380
Tiny Tim System Functional Specification	CISCO_LIONRA_00139323	CISCO_LIONRA_00139333
Virtual Switch Service cards functional specification	CISCO_LIONRA_00116529	CISCO_LIONRA_00116570
White Paper; Catalyst 6500 Series Service Provider Features	DEFS_LIONRA_00004866; DEFS_LIONRA_00004939	DEFS_LIONRA_00004878; DEFS_LIONRA_00004959
White Paper; Cisco Catalyst 6500 Architecture	CISCO_LIONRA_00330475	CISCO_LIONRA_00330501
White Paper; Comparison of the Cisco Catalyst and Cisco IOS Operating Systems for the Cisco Catalyst 6500 Series Switch Version 2	DEFS_LIONRA_00004879; CISCO_LIONRA_00045227	DEFS_LIONRA_00004920; CISCO_LIONRA_00045294
White Paper; High Availability for the Cisco Catalyst 6500 Series Switches	CISCO_LIONRA_00045421	CISCO_LIONRA_00045439
Wargo Depo Ex. 13; Catalyst 6500/Cisco 7600 Firewall and Security Services Architecture Specification	CISCO_LIONRA_00130986	CISCO_LIONRA_00131004

System, Publication, or Other Document	Bates Beg	Bates End
Cisco Blogs "Cisco Catalyst 6500 Series Switches Celebrates 20th Birthday"	CISCO_LIONRA_00333436	CISCO_LIONRA_00333445
Cisco Newsroom "Cisco Advances Network Security; Integrates Multigigabit Network Security Services into the Catalyst 6500 Series"	CISCO_LIONRA_00333630	CISCO_LIONRA_00333633
Wargo Depo Ex. 22; Fornax Catalyst 6000 Firewall Blade Concept Commit	CISCO_LIONRA_TP_00000021	CISCO_LIONRA_TP_00000073
Cisco Press Release "Cisco Advances Network Security; Integrates Multigigabit Network Security Services into the Catalyst 6500 Series"	LIONRA-EDTX-00070038	LIONRA-EDTX_00070041
Switch Meshing as implemented on HP ProCurve 5300 Series		
HP ProCurve Series 5300xl Switches Management and Configuration Guide	DEFS_LIONRA_00006361	DEFS_LIONRA_00006992
HP ProCurve Switch 5300xl Series Reviewer's Guide, Version 1.1, 2003-02-11	DEFS_LIONRA_00006326	DEFS_LIONRA_00006360
HP ProCurve Switch xl modules Installation Guide	DEFS_LIONRA_00006993	DEFS_LIONRA_00007028

II.   Persons To Be Identified Under 35 U.S.C. § 282(c)

Name	Address
Dr. Tajana Rosing	University of California San Diego
Computer Science and Engineering Department
3235 Voigt Dr

Name	Address
	La Jolla, CA 92093
Dr. Kevin Jeffay	University of North Carolina at Chapel Hill Department of Computer Science 201 S Columbia St Chapel Hill, NC 27599
Shawn Wargo	Cisco Systems, Inc. 300 East Tasman Dr. San Jose, CA 95134 USA
Dr. Melvin Tsai	Cisco Systems, Inc. 500 Terry A Francois Blvd San Francisco, CA 94158
Jeremy Felix	Cisco Systems, Inc. 500 Terry A Francois Blvd San Francisco, CA 94158

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Cisco reserves the right to supplement or to modify this Section 282 Notice through and including the time of trial.

DATE: April 19, 2024   Respectfully submitted,

/s/ Brian A. Rosenthal

Brian A. Rosenthal (lead attorney)
brosenthal@gibsondunn.com
Karl Kowallis
kkowallis@gibsondunn.com
Vivian Lu
vlu@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue
New York, NY 10166-0193
Telephone: 212.351.6300
Facsimile: 212.351.4035

Christine Ranney
cranney@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
1801 California St.
Denver, CO 80202-2642
Telephone: 303.298.5700
Facsimile: 650.849.5333

Albert Suarez IV
asuarez@gibsondunn.com
Texas State Bar No. 24113094
Ashbey Morgan
anmorgan@gibsondunn.com
Texas State Bar No. 24106339
Audrey Yang
ayang@gibsondunn.com
Texas State Bar No. 24118593
Julia Tabat
jtabat@gibsondunn.com
Texas State Bar No. 24139414
GIBSON, DUNN & CRUTCHER LLP
2001 Ross Avenue, Suite 2100
Dallas, TX 75201-6912
Telephone: 214.698.3360
Facsimile: 214.571.2907

Jennifer Rho
jrho@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
333 S Grand Ave
Los Angeles, CA 90071-3197
Telephone: 213.229.7000
Facsimile: 213.229.6103

Melissa R. Smith
melissa@gillamsmithlaw.com
Texas State Bar No. 26301351
GILLAM & SMITH, LLP
303 South Washington Avenue
Marshall, Texas 75670
Telephone: 903.934.8450
Facsimile: 903.934.9257

Attorneys for Defendant Cisco Systems, Inc.

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<u>CERTIFICATE OF SERVICE</u>

I hereby certify that notice was served via email on counsel of record on April 19, 2024.

/s/ Brian A. Rosenthal
Brian A. Rosenthal